

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: WAYNE BLACK**

**Case No.: 20-11143**

**OBJECTION TO CONFIRMATION OF PLAN**

COMES NOW, the Creditor, Prestige Auto Sales, by and through its attorney of record and files this, its Objection to Confirmation of Chapter 13 Plan as to the Creditor's treatment for the purpose of plan confirmation and would respectfully show unto this honorable Court, as follows:

(1)

That the Debtor filed a Chapter 13 Plan where in he excluded collateral held by Prestige Auto Sales, namely, a 2002 Dodge Ram 1500 VIN#1D7HA16Z82J240198.

(2)

The Creditor would show that the value of the collateral as indicated and represented by the Debtor is \$4,117.50 respectively and that the Creditor should be fully secured.

(3)

The Creditor would show that the debt presently owed on the property is \$2,917.31 protected by collateral valued at \$4,117.50 making the Creditor, Prestige Auto Sales, fully secured.

WHEREFORE, PREMISES CONSIDERED, the Creditor, Prestige Auto Sales, prays that the Court will sustain its objection and deny Confirmation of the Debtor's proposed treatment and that the Creditor be paid in full at a rate according to the proper valuation and for other relief as is good and equitable. Further, that the Court will dismiss the Debtor's Chapter 13 bankruptcy.

Respectfully submitted,

AKINS & ADAMS, P. A.

By: /s/ Bart M. Adams

Bart M. Adams

Attorney for Prestige

AKINS & ADAMS, P. A.  
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### **CERTIFICATE OF SERVICE**

I, Bart M. Adams, attorney of record for the Creditor, do hereby certify that the following parties, being registered with the CM/ECF system, have this day received electronic notification to:

Locke D. Barkley [sbeasley@barkley13.com](mailto:sbeasley@barkley13.com)

U. S Trustee [USTPRegion05.AB.ECF@usdoj.gov](mailto:USTPRegion05.AB.ECF@usdoj.gov)

Robert H. Lomenick, Jr. [rlomenick@gmail.com](mailto:rlomenick@gmail.com)

SO, CERTIFIED, this, the 30<sup>th</sup> day of March, 2020.

/s/ Bart M. Adams

Bart M. Adams

Attorney for Creditor